

MELISSA HALL,  
on behalf of herself  
and others similarly situated,

Plaintiff,

V.

COUNTY OF MILWAUKEE,  
DAVID A. CLARKE, JR., in his  
Official capacity,

Defendants.

No. 17-cv-379

Hon. Lynn Adelman

# JURY TRIAL DEMANDED

## JOINT PROPOSED PRETRIAL SCHEDULE

Now come, Melissa Hall, by and through her attorneys, Loevy & Loevy, and the Defendants, by and through their attorneys, Husch Blackwell, and propose an amended pretrial schedule:

1. As Plaintiff anticipated in the previously proposed schedule, her counsel has now filed another lawsuit related to Milwaukee County Jail's restraint policy as applied to pregnant, laboring, and post-partum women. Dkt. No. 46 n.1; *Robles v. County of Milwaukee*; No. 18-1328. *Hall* and *Robles* are both assigned to Hon. Lynn Adelman.
2. The County has indicated that the approximately one dozen witnesses it will present in *Hall* will also likely be necessary in *Robles*.
3. The parties have worked together to complete depositions in *Hall*, but several depositions remain.

4. In the interests of efficiency, the parties propose that the discovery in *Hall* and *Robles* proceed on a consolidated schedule as follows:
  - a. Close of Fact Discovery: February 1, 2019
  - b. Plaintiff's Rule 26 (a) (2) Disclosures: March 1, 2019
  - c. Defendants' Rule 26 (a) (2) Disclosures: April 1, 2019
  - d. Plaintiff's Rule 26 (a) (2) Rebuttal Disclosure: April 15, 2019
  - e. Dispositive Motion Deadline: May 15, 2019
5. Once service has been completed in *Robles*, the parties will submit this proposal in that case as well.

Respectfully submitted,

/s/ Theresa Kleinhaus  
*One of the Attorneys for Plaintiff*

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**CERTIFICATE OF SERVICE**

I, Theresa Kleinhaus, an attorney, certify that on October 5, 2018 I caused the foregoing **Joint Proposed Scheduling Order** to be filed via the Court's CM/ECF electronic filing system, which effected service on all counsel of record.

/s/ Theresa Kleinhaus